

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 20-cv-06323 (JSR)

KATHERINE BROOKS, on behalf of  
herself and all others similarly situated,

Plaintiff,

v.

CURALEAF INC., a Delaware  
corporation,

Defendant.

**PROPOSED STIPULATION AND ORDER**

**FOR VOLUNTARY DISMISSAL WITH PREJUDICE**

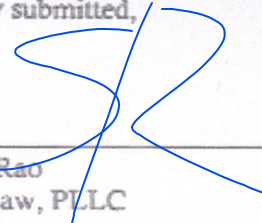
Plaintiff KATHERINE BROOKS and Defendant CURALEAF, INC., pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby jointly stipulate to the entry of a Final Order of Dismissal With Prejudice as follows and request the Court to enter the Final Order of Voluntary Dismissal With Prejudice:

1. This action, and all claims that were or could have been brought, is dismissed with prejudice.
2. The Parties shall bear their own attorneys' fees and costs.

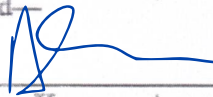
WHEREFORE, the Parties respectfully request the Court to enter the Final Order of Voluntary Dismissal With Prejudice.

Respectfully submitted,


Plaintiff:

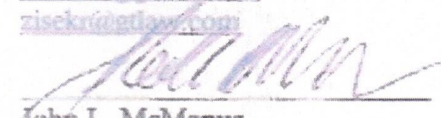
  
Siddhartha Rao  
Romano Law, PLLC  
55 Broad Street  
18<sup>th</sup> Floor  
New York, NY 10004  
Telephone: (212) 865-9848  
[sid@romanolaw.com](mailto:sid@romanolaw.com)

--and--

  
Abbas Kazercounian  
Yana Hart  
Kazercouni Law Group, APC  
245 Fischer Avenue  
Suite D1  
Costa Mesa, CA 92626  
Telephone: (800) 400-6808  
Facsimile: (800) 520-5523  
[abbas@kzlg.com](mailto:abbas@kzlg.com)  
[yana@kzlg.com](mailto:yana@kzlg.com)

Counsel for Curaleaf:

  
Louis Smith  
Rebecca Zisek  
Greenberg Traurig, LLP  
500 Campus Drive  
Suite 400  
Florham Park, New Jersey 07932  
Telephone: (973) 360-7900  
Facsimile: (973) 301-8410  
[smithlo@gtlaw.com](mailto:smithlo@gtlaw.com)  
[zisekr@gtlaw.com](mailto:zisekr@gtlaw.com)

  
John L. McManus  
Greenberg Traurig, P.A.  
401 East Las Olas Boulevard,  
Suite 2000  
Fort Lauderdale, FL 33301  
Telephone: (954) 765-0500  
Facsimile: (954) 765-1477  
[mcmmanusi@gtlaw.com](mailto:mcmmanusi@gtlaw.com)

SO ORDERED:

  
Honorable Jed S. Rakoff, U.S.D.J.

1/21/2021

Copies to: All Counsel and Parties of Record